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Counsel to Howrey LLP

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:)	Case No. 11-31376-DM
)	
HOWREY LLP,)	Chapter 11
)	
A District of Columbia Limited Liability Partnership,)	<i>[Hearing Date and Time to be Determined]</i>
)	
Debtor(s).)	
)	
1201 Pennsylvania Avenue, Suite 300)	
Washington D.C., 20004)	
)	
Employer's Tax I.D. No: 53-0231650)	

DECLARATION OF ROBERT RUYAK IN SUPPORT OF DEBTOR'S MOTION TO EXTEND EXCLUSIVE PERIODS FOR FILING A CHAPTER 11 PLAN AND SOLICITING ACCEPTANCES

1 I, Robert Ruyak, hereby declare as follows:

2 1. I am a member of the Dissolution Committee of Howrey LLP and have been
3 designated the “responsible individual” for the Debtor pursuant to Local Bankruptcy Rule 4002-1. I
4 submit this Declaration in connection with and in support of the DEBTOR’S MOTION TO EXTEND
5 EXCLUSIVE PERIODS FOR FILING A CHAPTER 11 PLAN AND SOLICITING ACCEPTANCES. I have
6 personal knowledge of the facts set forth below, and if called to testify, I would testify competently
7 thereto.

8 2. The Debtor has worked with the Official Committee of Unsecured Creditors
9 (“Committee”) on a number of issues related to the preparation and filing of a chapter 11 plan. In
10 particular, the Debtor and the Committee are parties to a Memorandum of Understanding (“MOU”)
11 certain provisions of which the parties have agreed to incorporate into a plan of liquidation. The
12 MOU also contains various items that the parties have agreed are the subject of negotiation.

13 3. The Debtor has regularly met with the Committee and Citibank both in person and
14 telephonically since the entry of the Order for Relief to discuss the various matters related to the
15 MOU and a proposed plan.

16 4. In addition, the Debtor is currently analyzing and evaluating the various claims
17 against the estate in order to determine the amount of funds that will be necessary to confirm a plan
18 of liquidation.

19 5. The Debtor has a substantial interest in a number of pending matters which it
20 undertook on a contingency fee basis. The Debtor believes that its interest in these cases will result
21 in substantial recoveries to the estate, which may be used to pay its secured obligations and fund a
22 plan of liquidation. However, the Debtor requires additional time to determine with more accuracy
23 the likely proceeds it will receive from these cases.

24 6. The Debtor is not requesting an extension of the exclusive periods in order to pressure
25 its creditors. To the contrary, the Debtor is working cooperatively with its creditors and other parties
26 in interest in order to facilitate continued negotiations regarding a plan of liquidation and a fair and
27 equitable resolution of this case.

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1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct.

3 Executed this 15th day of September, 2011 in Washington D.C.

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5 /s/ Robert Ruyak
6 Robert Ruyak
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